IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

COTEMAR S.A. de C.V. and EXETER MARINE LIMITED and OCEAN OIL CONSTRUCTION AND SERVICES, S.A.R.L.	§ § 8	
CONSTRUCTION AND SERVICES, S.A.R.E.	8 8	
Plaintiffs,	§	
	§	
v.	§	C.A. No. 4:11-cv-04409
	§	(Admiralty)
HORNBECK OFFSHORE SERVICES,	§	
INC., HORNBECK OFFSHORE	§	
SERVICES, LLC, HORNBECK	§	
OFFSHORE OPERATORS, LLC	§	
and the OSV HOS BEAUFORT, in rem	§	
	§	
Defendants.	§	

DEFENDANTS' NOTICE OF FILING OF STIPULATION OF DISMISSAL IN COMPLIANCE WITH THE COURT'S ORDER OF MARCH 23, 2015

COME NOW, Defendants Hornbeck Offshore Services, Inc.; Hornbeck Offshore Services, LLC; and Hornbeck Offshore Operators, LLC (collectively referred to as "Defendants"), and file this Notice of Filing of Stipulation of Dismissal in Compliance With the Court's Order of March 23, 2015 ("Notice").

On March 23, 2015, this Court conditionally dismissed this case on the basis of *forum non conveniens*. (Document No. 189.) This dismissal was subject to a return jurisdiction clause that included the following conditions:

1. Defendants' agreement to submit to the jurisdiction of the appropriate

Mexican court, except Defendants retain their right to assert an

untimeliness, time bar, or statute of limitations defense in a Mexican

court; and

2. Defendants' agreement that they will work with Plaintiffs to arrange for

the appearance and testimony of Defendants' officers, agents, and

employees, if needed, in the appropriate Mexican court.

The Defendants are filing the requested Stipulation, attached to this notice,

assenting to these conditions in compliance with the Court's Order.

WHEREFORE, the Defendants respectfully request this Court accept the

attached Stipulation and dismiss Plaintiffs' case in accordance with the Court's

Order of March 23, 2015.

Dated: April 6, 2015

Respectfully submitted,

FOWLER RODRIGUEZ

By: <u>/s/ George J. Fowler, III</u>

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DEFENDANTS,

Hornbeck Offshore Services, Inc.; Hornbeck Offshore Services, LLC; and Hornbeck Offshore Operators, LLC

CERTIFICATE OF SERVICE

I hereby certify that I forwarded a true and correct copy of the foregoing instrument to the following counsel of record via the court's ECF filing system, on this the 6th day of April, 2015, as follows:

Julia M. Palmer jpalmer@grayreed.com Gray Reed & McGraw, P.C. 1300 Post Oak Blvd., Suite 2000 Houston, Texas 77056

> <u>/s/ George J. Fowler, III</u> George J. Fowler, III